

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

-v-

LLOYD CASIMIRO CRUZ, JR.,

Defendant.

Case No. 21-cr-00064 (RBW)

MOTION TO EXTEND DEADLINES

NOW COMES, Defendant, Lloyd Casimiro Cruz, Jr., by and through counsel, and herewith respectfully moves this Honorable Court for an order extending all deadlines in this case as it relates to this Defendant for a period of seven (7) days, to exclude the time within which a trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq. (the “STA”) on the basis that the ends of justice served by taking such actions outweigh the best interest of the public and the defendant in a speedy trial pursuant to the factors described in 18 U.S.C. § 3161(h)(7)(A), (B)(i), (ii), and (iv), and to set a status hearing to monitor the government’s progress in meeting its discovery obligations. On March 28, 2022, Counsel for the Defendant filed his appearance. (Dkt. No. 18). The extension of all deadlines will allow Counsel time to update himself with the case and hopefully allow Defendant and the Government to further pursue ways for resolution of this case without the necessity of a jury trial.

Further, the government has been diligent in its disclosure of discovery, having produced numerous terabytes of discovery, which contain tens of thousands of videos and documents. Additionally, the government has uploaded 24,261 videos to Evidence.com, and 34,095 documents and videos to the Relativity discovery platform. The government continues to make disclosures on a rolling basis.

Indexing, organizing, and searching through the discovery has proven to be a herculean task for all defense counsel, whether court-appointed or privately retained. Much of the discovery provided by the government to date is relevant to the Defendant Cruz's case, and not generic in nature.

Defense counsel acknowledges the court's desire to bring this case to trial in an expedient fashion; however, defense counsel respectfully suggests that the ends of justice would best be served if defense counsel were given additional time to review the evidence to help coordinate defense experts and witnesses and generally prepare for trial. Defense counsel acknowledges that the request to continue the trial date may impact the court's August 5, 2022, Scheduling Order.

WHEREFORE, for the foregoing reasons, Defendant Cruz, respectfully requests this Honorable Court to enter an order extending all deadlines as they relate to the Defendant Lloyd Casimiro Cruz, Jr. for a period of seven (7) days.

Dated: August 19, 2022

/s/ John M. Pierce
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Lloyd Casimiro Cruz, Jr.*

CERTIFICATE OF SERVICE

I hereby certify that, on August 19, 2022, this motion and the accompany declaration was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ John M. Pierce
John M. Pierce